

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2009-108-C - ORDER NO. 2009-517
AUGUST 5, 2009

IN RE:	Application of Long Distance Consolidated)	ORDER GRANTING
	Billing Company for Authority to Operate as a)	CERTIFICATE OF
	Reseller of Interexchange Telecommunication)	PUBLIC
	Services within the State of South Carolina and)	CONVENIENCE AND
	to be Regulated in Accordance with Procedures)	NECESSITY
	Established for Alternative Regulation)	

This matter comes before the Public Service Commission of South Carolina ("Commission") by way of the Application of Long Distance Consolidated Billing Company ("Long Distance" or the "Company") requesting a Certificate of Public Convenience and Necessity authorizing it to provide resold interexchange telecommunications services within the State of South Carolina. The Company's Application was filed pursuant to S.C. Code Ann. §58-9-280 and the rules and regulations of the Commission. By its Application, Long Distance also requests alternative regulation of its business interexchange services consistent with Commission Orders, and waiver of certain Commission regulations.

The Commission's Docketing Department instructed Long Distance to publish, one time, a Notice of Filing in newspapers of general circulation in the areas of the state affected by the Application. The purpose of the Notice of Filing was to inform interested parties of the Application of Long Distance and of the manner and time in which to file the appropriate pleadings for participation in the proceeding. Long Distance complied with

this instruction and provided the Commission with proof of publication of the Notice of Filing. No Petitions to Intervene or Protests were filed.

Subsequently, a hearing was convened on June 8, 2009, at 10:00 a.m. in the offices of the Commission in Columbia, South Carolina, before F. David Butler, Hearing Examiner. Long Distance was represented by Scott Elliott, Esquire. The Office of Regulatory Staff ("ORS") was represented by Lessie Hammonds, Esquire.

At the outset of the hearing, the parties introduced a settlement agreement into the record as Exhibit 1. William VanderPloeg testified in support of the Company's Application. The record reveals that Long Distance is a corporation organized under the laws of the State of Michigan and duly authorized to transact business in South Carolina. According to William VanderPloeg, the Company seeks authority as a reseller of interexchange services. Mr. VanderPloeg explained the Company's request for authority, and the record further reveals the Company's services, operations, and marketing procedures. The Company intends to market interexchange services. Mr. VanderPloeg also discussed Long Distance's technical, financial, and managerial resources to provide the services for which it seeks authority.

With regard to technical, financial, and managerial capabilities, the Company's Application and Mr. VanderPloeg's testimony both evidence that Long Distance's management has extensive experience in telecommunications, technical and business disciplines. Mr. VanderPloeg also testified that Long Distance will operate in accordance with Commission rules, regulations, guidelines, and Commission Orders. Mr. VanderPloeg offered that approval of Long Distance's Application would serve the public interest.

The Applicant requests waivers of certain Commission rules and regulations. The Company has requested waiver of the requirement that it publish and distribute a local telephone directory under Regulation 103-631. Further, the Applicant requests a waiver of the requirement that it maintain its books and records within the State of South Carolina as required by Regulation 103-610. The Company asserts that it will keep its books and records at its principal place of business and will make its books and records available for inspection by the staff as requested. Since the Applicant's local exchange calling areas will mirror the service areas of the incumbent local exchange carriers, the Company requests a waiver of any map filing requirements of 26 SC Code Ann. Reg. 103-612.2.3.

After consideration of the applicable law, the Company's Application, and the evidence presented at the hearing, the Commission hereby issues its findings of fact and conclusions of law:

FINDINGS OF FACT

1. Long Distance is organized under the laws of the State of Michigan as a Limited Liability Company and is authorized to do business in South Carolina by the Secretary of State.

2. Long Distance desires to operate as a provider of resold interexchange services in South Carolina.

3. Long Distance possesses the managerial, technical, and financial experience and capability to operate as a provider, through resale, of interexchange services in South Carolina.

4. The issuance of a Certificate of Public Convenience and Necessity to Long Distance to operate as a reseller of interexchange services in South Carolina would be in the best interest of the citizens of South Carolina by providing more innovative services.

5. The Company has the managerial, technical, and financial resources to provide the services as described in its Application.

6. We find that the waivers as requested by Long Distance that it (1) not be required to publish and distribute a local telephone directory, (2) not be required to publish a map of its service territory, (3) be allowed to maintain its books and records at its principal place of business rather than within South Carolina, and (4) be allowed to keep its books and financial records in accordance with Generally Accepted Accounting Principles should be granted. We find that compliance with these Commission requirements would present unusual difficulty for Long Distance. Further, we find that the waiver of these requirements will not create any hardship to the public or adversely affect the public interest.

7. The Settlement Agreement between ORS and Long Distance is approved and attached as Order Exhibit 1.

CONCLUSIONS OF LAW

1. The Commission concludes that Long Distance possesses the managerial, technical, and financial resources to provide the telecommunications services as described in its Application.

2. The Commission concludes that the issuance of the authority to provide intrastate interexchange telecommunications services as requested by Long Distance and as

set forth in its Application and Mr. VanderPloeg's testimony is in the best interest of the citizens of the State of South Carolina.

3. The Commission concludes that a Certificate of Public Convenience and Necessity should be granted to Long Distance to provide resold intrastate interexchange telecommunications services.

4. The Commission adopts a rate design for Long Distance for its residential interexchange services, if any, which include maximum rate levels for each tariff charge. A rate structure incorporating maximum rate levels with the flexibility for adjustment below the maximum rate levels has been previously adopted by the Commission. In Re: Application of GTE Sprint Communications Corporation, etc.. Order No. 84-622, issued in Docket No. 84-10-C (August 2, 1984).

5. Long Distance shall not adjust its residential interexchange rates for end-users, if any, below the approved maximum level without notice to the Commission and to the public. Long Distance shall file its proposed rate changes, publish its notice of such changes, and file affidavits of publication with the Commission two weeks prior to the effective date of the changes. However, the public notice requirement is waived, and therefore not required, for reductions below the maximum cap in instances which do not affect the general body of subscribers or do not constitute a general rate reduction. In Re: Application of GTE Sprint Communications, etc., Order No. 93-638, issued in Docket No. 84-10-C (July 16, 1993). Any proposed increase in the maximum rate level for residential interexchange services reflected in the tariff which would be applicable to the general body of the Company's subscribers shall constitute a general ratemaking proceeding and will be

treated in accordance with the notice and hearing provisions of S.C. Code Ann. §58-9-540 (Supp. 2008).

6. The Commission concludes that Long Distance's intrastate interexchange business telecommunications services shall be regulated in accordance with the principles and procedures established for alternative regulation of business service offerings set out in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C. The Commission has previously granted this "alternative regulation" to competitive intrastate interexchange carriers operating within South Carolina, and the Commission concludes that the competitive marketplace requires the Commission to allow this flexible regulation to those carriers which request it. Specifically, the Commission-approved alternative regulation allows business service offerings, including consumer card services and operator services, to be subject to a relaxed regulatory scheme identical to that granted to AT&T Communications in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C.

However, pursuant to Order No. 2001-997 (Docket No. 2000-407-C), this Commission has modified alternative regulation by the re-imposition of rate caps with regard to certain "operator-assisted calls" where a customer uses a local exchange carrier's calling card to complete calls from locations which have not selected that local exchange carrier as the toll provider. Order No. 2001-997, dated November 8, 2001, imposed a maximum cap of \$1.75 for operator surcharges for such calls, and a maximum cap of \$0.35 related to the flat per-minute rate associated with these calls. Under this relaxed regulatory scheme, tariff filings for business services shall be presumed valid upon filing. The Commission will have seven (7) days in which to institute an investigation of any tariff

filing. If the Commission institutes an investigation of a particular tariff filing within the seven days, the tariff filing will then be suspended until further Order of the Commission.

7. The Commission concludes that Long Distance's request for waiver of 26 S.C. Code Ann. Regs. 103-610 should be granted as strict compliance with the regulation would potentially cause undue hardship on that Company. The waiver is not contrary to the public interest.

8. The Commission concludes that the waivers as requested by Long Distance that it (1) not be required to publish and distribute a local telephone directory, (2) not be required to publish a map of its service territory, and (3) be allowed to maintain its books and records at its principal place of business rather than within South Carolina will not adversely impact the public interest in South Carolina, and therefore we conclude that the requested waivers should be granted.

9. The Settlement Agreement between the ORS and Long Distance is approved and is attached and incorporated herein as Order Exhibit 1.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. A Certificate of Public Convenience and Necessity should be granted to Long Distance to provide intrastate interexchange services through the resale of services authorized for resale by tariffs of carriers approved by the Commission within the State of South Carolina.

2. The Company's rate designs for its products shall conform to those designs described in Conclusions of Law above.

3. If it has not already done so by the date of issuance of this Order, Long Distance shall file its revised tariff utilizing the Commission's e-filing system for tariffs. The revised tariff should be electronically filed in a text searchable PDF format using the Commission's DMS System (<http://dms.psc.sc.gov>). An additional copy should be sent via email to etariff@psc.sc.gov to be included in the Commission's ETariff System (<http://etariff.psc.sc.gov>). Future revisions to the tariff should be made using the ETariff System. The revised tariff shall be consistent with the findings of this Order and shall be consistent with the Commission's Rules and Regulations.

4. The Company's service is subject to access charges pursuant to Commission Order No. 86-584, in which the Commission determined that for access purposes resellers and facilities-based interexchange carriers should be treated similarly.

5. With regard to the Company's resale of service, an end-user should be able to access another interexchange carrier or operator service provider if the end-user so desires.

6. Long Distance shall resell the services of only those interexchange carriers or LECs authorized to do business in South Carolina by this Commission. If Long Distance changes underlying carriers, it shall notify the Commission in writing.

7. With regard to the origination and termination of toll calls within the same LATA, Long Distance shall comply with the terms of Order No. 93-462, Order Approving Stipulation and Agreement, in Docket Nos. 92-182-C, 92-183-C, and 92-200-C (June 3, 1993), with the exception of the 10-XXX intraLATA dialing requirement, which has been rendered obsolete by the toll dialing parity rules established by the FCC pursuant to the

Telecommunications Act of 1996 (See, 47 CFR 51.209). Specifically, Long Distance shall comply with the imputation standard as adopted by Order No. 93-462 and more fully described in paragraph 4 of the Stipulation and Appendix B approved by Order No. 93-462.

8. Long Distance shall file annual financial information in the form of annual reports and gross receipts reports as required by the Commission. The annual report and the gross receipt report will necessitate the filing of information on its South Carolina operations. Therefore, Long Distance shall keep financial records on a state basis for South Carolina to comply with the annual report and gross receipts filings. The proper form for filing annual financial information can be found at the Commission's website or at the ORS's website at www.regulatorystaff.sc.gov. The title of this form is "Telecommunications Company Annual Report." This form shall be utilized by the Company to file annual financial information with the Commission and ORS and shall be filed no later than April 1st.

Commission gross receipts forms are due to be filed no later than August 31st of each year. The proper form and instructions for filing gross receipts information can be found at the ORS website at www.regulatorystaff.sc.gov, and the appropriate form is entitled "Gross Receipts Form."

Each telecommunications company certified in South Carolina is required to file annually with the ORS the South Carolina Universal Service Fund ("USF") Contribution Worksheet. The Worksheet and Instructions are located on the ORS's website at www.regulatorystaff.sc.gov. This worksheet provides ORS information required to

determine each telecommunications company's liability to the State USF fund. The State USF worksheet is due to be filed annually no later than July 1st.

9. The Company shall, in compliance with Commission regulations, designate and maintain an authorized utility representative who is prepared to discuss, on a regulatory level, customer relations (complaint) matters, engineering operations, tests, and repairs. In addition, the Company shall provide to the Commission and ORS in writing the name of the authorized representative to be contacted in connection with general management duties as well as emergencies which occur during non-office hours. Long Distance shall file the names, addresses, and telephone numbers of these representatives with the Commission within thirty (30) days of receipt of this Order. The "Authorized Utility Representative Information" form can be found at the ORS website at www.regulatorystaff.sc.gov. This form shall be utilized for the provision of this information to the Commission and ORS. Further, the Company shall promptly notify the Commission and ORS in writing if the representatives are replaced.

10. The Company is directed to comply with all Rules and Regulations of the Commission, unless a regulation is specifically waived by the Commission.

11. For good cause shown, Long Distance is granted a waiver and is hereby authorized to keep its books and financial records in accordance with Generally Accepted Accounting Principles rather than the Uniform System of Accounts method.

12. For good cause shown, Long Distance is granted a waiver of the requirements that the Company publish and distribute a local directory as required by 26 S.C. Code Ann. Reg. 103-631.

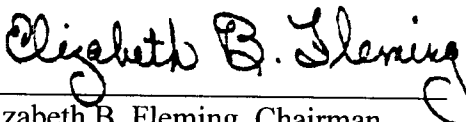
13. For good cause shown, Long Distance is granted a waiver of the requirement that it publish a map of its service territory as required by 26 SC Code Ann. Regs. 103-612.2.3.

14. For good cause shown, Long Distance is granted a waiver of the requirement that it maintain its books and records in South Carolina as required under 26 S.C. Ann. Regs. 103-610. However, as a condition of being granted a waiver of the requirement to maintain corporate books and records within the State of South Carolina, Long Distance is authorized to maintain its books and records at its principal place of business, and Long Distance shall make such books and records available, at the Company's expense, to the Commission staff or employees upon request.

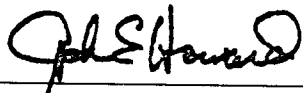
15. The Settlement Agreement between ORS and Long Distance (Order Exhibit 1) is hereby approved.

16. This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:


Elizabeth B. Fleming, Chairman

ATTEST:


John E. Howard, Vice Chairman

(SEAL)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2009-108-C

In Re:)	
Application of Long Distance Consolidated Billing Co.)	
for a Certificate of Public Convenience and Necessity)	
to Provide Resold Interexchange)	SETTLEMENT AGREEMENT
Telecommunications Services and)	
Alternative Regulation)	

This Settlement Agreement (“Settlement Agreement”) is made by and among the Office of Regulatory Staff (“ORS”) and Long Distance Consolidated Billing Co. (“Long Distance ” or “the Company”) (collectively referred to as the “Parties” or sometimes individually as “Party”);

WHEREAS, on March 4, 2009, the Company filed its Application requesting: (i) a Certificate of Public Convenience and Necessity be granted authorizing the Company to provide resold interexchange services throughout the State of South Carolina; (ii) alternative regulation of its interexchange services, in accordance with Orders 95-1734 and 96-55 in Docket No. 95-661-C; (iii) for waiver of certain Commission Regulations, specifically Regulation 103-610 regarding location of records, and 103-612.2.3 for operating maps and 103-631 concerning publishing and distributing local exchange directories;

WHEREAS, on March 13, 2009, the Company pre-filed a testimony letter on behalf of the Docketing Department;

WHEREAS the Commission set a return date of April 27, 2009, for the filing of letters of protest or petitions to intervene and established a hearing date of June 8, 2009 for the application to be heard before a hearing examiner;

WHEREAS, on March 25, 2009, the Commission issued its Order No. 2009-181 by which the Commission appointed David Butler, Esquire as the Hearing Examiner in this matter;

WHEREAS, on April 17, 2009, Long Distance filed the direct testimony of Jan Lowe with the Commission;

WHEREAS, the purpose of this proceeding is to review the application filed by the Company and its requests: (i) for a Certificate of Public Convenience and Necessity to provide resold interexchange telecommunications services within the State of South Carolina; (ii) for alternative regulation of its interexchange services consistent with Orders 95-1734 and 96-55 in Docket No. 95-661-C; (iii) for waiver of certain Commission Regulations, specifically Regulations 103-610 regarding location of records; and (iv) for waiver of certain Commission Regulations, specifically Regulations 103-612.2.3 for operating maps and 103-631 concerning publishing and distributing local exchange directories;

WHEREAS, since the filing of the notice, ORS has conducted a review of the technical, managerial, and financial expertise of the Company to provide the services requested in the Application;

WHEREAS, ORS has reviewed the Application and the financial data provided by the Company, and ORS has calculated certain performance ratios based upon information provided by the Company;

WHEREAS, ORS has investigated the services to be offered by the Company and its intended customer service plans;

WHEREAS, ORS has reviewed the proposed tariffs submitted by the Company;

WHEREAS, as a result of its investigations, ORS has determined: (a) the Company intends to offer resold long-distance telecommunications services in the state of South Carolina;

(b) the Company's officers possess sufficient technical and managerial abilities to adequately provide the services applied for; (c) based upon the information provided, the Company appears to have access to sufficient financial resources necessary to provide the services proposed in its application; (d) the Company's proposed tariffs with the amendments as agreed to in this Settlement Agreement comply with Commission statutes and regulations; (e) the services as outlined and offered by the Company will meet the service standards required by the Commission; (f) the provision of services by the Company will not adversely impact the availability of affordable telecommunications services; (g) to the extent it is required to do so by the Commission, the Company will participate in the support of universally available telephone service at affordable rates; and (h) the provision of services by the Company will not adversely impact the public interest;

WHEREAS, to ensure compliance with the Commission's statutes and regulations, the Parties have agreed to the following comprehensive settlement of all issues in this docket;

WHEREFORE, in the spirit of compromise, the Parties hereby stipulate and agree to the following terms and conditions:

- 1) The Parties agree that the Company's Application and exhibits to the Application are incorporated into this Settlement Agreement and made a part hereof;
- 2) The Parties agree to stipulate into the record before the Commission this Settlement Agreement;
- 3) The Parties agree to stipulate to the filed testimony of the Company's witness Jan Lowe without cross-examination by ORS;
- 4) The Company has submitted financial data which was provided as Attachment 5 to the Application and which financial data is incorporated by reference;

5) The Parties agree that the Company should be granted a Certificate of Public Convenience and Necessity to provide resold interexchange telecommunications services within the state of South Carolina;

6) The Company has requested a waiver of 26 S.C. Code Ann. Regs. 103-610 concerning the location of books and records. However, S.C. Code Ann. §58-9-380 (Supp. 2008) provides that:

Each telephone utility shall have an office in one of the counties of this State in which its property or some part thereof is located and shall keep in such office all such books, accounts, papers and records as shall reasonably be required by the Office of Regulatory Staff. No books, accounts, papers or records required by the ORS to be kept within the State shall be removed at any time from the State except upon such conditions as may be prescribed by the Office of Regulatory Staff.

ORS is agreeable to allowing the Company to maintain its books and records outside of the State of South Carolina in exchange for the Company agreeing to provide access to its books and records. ORS is agreeable to the Company maintaining its books and records at its principal offices in the State of Michigan, and the Company agrees to notify the ORS of any change in the location of the principal office or in the location where the books and records are maintained. This provision of the Settlement Agreement shall not be construed as a waiver by ORS of S.C. Code Ann. § 58-4-55 (Supp. 2008) or § 58-9-1070 (Supp. 2008). ORS expressly reserves its rights to require the production of books, records, and other information located within or outside of the State of South Carolina in order to carry out its duties in compliance with any state or federal regulation;

7) ORS does not oppose the Company's requests: for alternative regulation of its interexchange business services, consumer card services, and operator services consistent with the procedures described and set forth in Orders 95-1734 and 96-55 in Docket No. 95-661-C as

modified by Order No. 2001-997 in Docket No. 2000-407-C, specifically (i) regulation of these services listed above in the same manner as these services are regulated for AT&T Communications of the Southern States, Inc., (ii) removal of the maximum rate tariff requirements for the Company's business services, private line, and customer network-type offerings, except in instances governed by Order No. 2001-997 which reinstituted maximum rates for surcharges and rates associated with certain intrastate operator-assisted calls; (iii) presumptively valid tariff filings for these interexchange services unless an investigation of a particular filing is instituted within seven (7) days, in which case the tariff filing will be suspended until resolution of the investigation or until further order of the Commission; and (iv) allowing the Company the same treatment as AT&T Communications of the Southern States, Inc. in connection with any future relaxation of reporting requirements;

8) ORS does not oppose Long Distance's request for waiver of 26 S.C. Code Ann. Regulation 103-631 which requires the publication and distribution of directories, because the publication and distribution of directories is principally associated with the provisions of local exchange services and Long Distance seeks solely to provide interexchange (long distance) services;

9) ORS does not oppose the Company's request for waiver of 26 S.C. Code Ann. Regulation 103-612.2.3 which requires the filing of operating area maps;

10) The Company agrees to resell the services only of those carriers authorized to do business in South Carolina by the Commission;

11) The Company agrees that it will allow an end-user of resold services to access an alternative interexchange carrier or operator service provider if the end-user expresses such a desire;

12) The Company agrees to file necessary financial and/or other information with the ORS and the Commission for universal service fund reporting, interim LEC fund reporting, annual reporting, gross receipts reporting, and/or any other reporting which may now or in the future be applicable to telecommunications providers such as the Company. The Parties agree that such reports shall be filed pursuant to ORS's instructions and monies shall be remitted in accordance with the directions of the ORS and the Commission requirements;

13) The Company agrees to maintain its books and records in a manner that would permit ORS to examine any of its reports filed with the Commission and provided to ORS;

14) The Company agrees to file with the Commission and ORS a completed authorized utility representative form within thirty (30) days of the Commission's order;

15) In the event the Company proposes to offer prepaid calling card services in the future, the Company agrees that it shall file a request with the Commission and post a surety bond or certificate of deposit for prepaid services in the amount of \$5,000 as required by the Commission, prior to offering such services;

16) The Company agrees to comply with the verification regulations governing change of preferred carriers as established by Federal Communications Commission ("FCC"). In addition, the Company agrees to comply with the marketing practices and guidelines established by the Commission in Order No. 95-658;

17) The Company agrees to comply with South Carolina Code Section § 58-9-300 entitled "Abandonment of Service." Additionally, to the extent applicable, the Company agrees to adhere to the FCC's rule 47 C.F.R. §§ 64.1190 and 64.1130 regarding preferred carrier freezes and the requirement that the form of the written authorization for the institution of the freeze be a separate or easily separable document. Prior to abandonment of service, the Company shall

remove any preferred carrier freeze so as to enable consumers to seamlessly transfer their telephone numbers to another provider;

18) The Company agrees to comply with all rules and regulations of the Commission unless the Commission has expressly waived such rule or regulation;

19) The Company agrees to file a final revised tariff with both the ORS and the Commission.

20) ORS is charged by law with the duty to represent the public interest of South Carolina pursuant to S.C. Code § 58-4-10 (B). S.C. Code § 58-4-10(B)(1) through (3) read in part as follows:

... 'public interest' means a balancing of the following:

- (1) concerns of the using and consuming public with respect to public utility services, regardless of the class of customer;
- (2) economic development and job attraction and retention in South Carolina; and
- (3) preservation of the financial integrity of the State's public utilities and continued investment in and maintenance of utility facilities so as to provide reliable and high quality utility services.

ORS believes the Settlement Agreement reached among the Parties serves the public interest as defined above;

21) The Parties agree to advocate that the Commission accept and approve this Settlement Agreement in its entirety as a fair, reasonable and full resolution of all issues in the above-captioned proceeding and that the Commission takes no action inconsistent with its adoption. The Parties further agree to cooperate in good faith with one another in recommending to the Commission that this Settlement Agreement be accepted and approved by the Commission. The Parties agree to use reasonable efforts to defend and support any Commission order issued approving this Settlement Agreement and the terms and conditions contained herein;

22) The Parties represent that the terms of this Settlement Agreement are based upon full and accurate information known as of the date this Settlement Agreement is executed. If, after execution, either Party is made aware of information that conflicts, nullifies, or is otherwise materially different than that information upon which this Settlement Agreement is based, either Party may withdraw from the Settlement Agreement with written notice to the other Party.

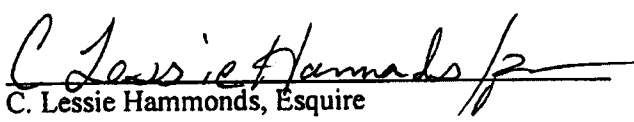
23) The Parties agree that signing this Settlement Agreement will not constrain, inhibit, impair or prejudice their arguments or positions held in other collateral proceedings, nor will it constitute a precedent or evidence of acceptable practice in future proceedings. If the Commission declines to approve the Settlement Agreement in its entirety, then any Party desiring to do so may withdraw from the Settlement Agreement in its entirety without penalty or obligation;

24) This Settlement Agreement shall be interpreted according to South Carolina law;

25) The above terms and conditions fully represent the agreement of the Parties hereto. Therefore, each Party acknowledges its consent and agreement to this Settlement Agreement by affixing its signature or by authorizing counsel to affix his or her signature to this document where indicated below. Counsel's signature represents his or her representation that his or her client has authorized the execution of the agreement. Facsimile signatures and email signatures shall be as effective as original signatures to bind any party. This document may be signed in counterparts, with the original signature pages combined with the body of the document constituting an original and provable copy of this Settlement Agreement. The Parties agree that in the event any Party should fail to indicate its consent to this Settlement Agreement and the terms contained herein, then this Settlement Agreement shall be null and void and will not be binding on any Party.

WE AGREE:

Representing the Office of Regulatory Staff

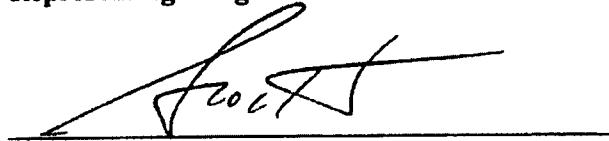


C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
Telephone: (803) 737-0803
Fax: (803) 737-0895
Email: lhammon@regstaff.sc.gov

6/3/09
Date

WE AGREE:

Representing Long Distance Consolidated Billing Co.



Scott Elliott Esquire
Elliott & Elliot, P.A.
701 Olive Street
Columbia, SC 29205
Telephone: (803) 771-0555
Fax: (803) 771-8010
Email: selliott@elliottlaw.us

June 3, 2009
Date